

Exhibit 11

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

[Insert Case Name and Number]

Crestwood School District v. Meta Platforms,
Inc., et al.

4:23-cv-04568-YGR

**PLAINTIFF FACT SHEET – SCHOOL
DISTRICTS**

INSTRUCTIONS

Use of this fact sheet. Each school-district plaintiff that has filed a complaint in this action must complete this Plaintiff Fact Sheet. If more than one school district is a plaintiff on a single complaint, each individual school district must submit its own individual Plaintiff Fact Sheet. This Plaintiff Fact Sheet constitutes discovery responses subject to the Federal Rules of Civil Procedure. The information provided will only be used for purposes related to this litigation and may be disclosed only as permitted by the Protective Order entered in this litigation.

Terms used. “You,” “your,” “Plaintiff,” and “School District” as used throughout this fact sheet refers to the school district completing this form. “Social media” refers to Defendants’ social media platforms as described in your complaint.

Certification. In completing this Plaintiff Fact Sheet, you are representing that you are an authorized representative of the school district bringing the lawsuit. You must certify under oath that the information is true and correct to the best of your knowledge, information, and belief.

Instructions regarding requests for information. Do not leave any questions unanswered or blank; if you cannot recall all of the information requested, provide as much information as you can. You should insert additional space where necessary to answer the questions completely. You should consult with your attorney about completing this form. None of the requests are designed to require an expert evaluation or limit expert testimony. None of the requests are designed to require review of individual student records.

Instructions regarding document requests. For each question calling for the production of documents, indicate whether you possess any existing documents responsive to the request. A request will indicate where it only requires that you produce information that has already been compiled and/or exists in report, survey, analysis, study, or other document that provides an overview of or describes the indicated topic. If information has not been compiled or summarized on these topics, it does not need to be located, described, or produced for the purposes of this Plaintiff Fact Sheet. For example, you are not required to locate, compile, sort, describe or produce underlying records that might show, for example, the prevalence of student use of social media or expenses incurred to address problems arising from student use of social media; however, you are required to produce existing reports, surveys, analyses, studies, or other overviews on that topic.

To determine whether you have any responsive documents, you are required to investigate whether you have the information sought. This investigation might involve a district employee asking the appropriate person at each school to provide the district with documents or reports responsive to the requests. You do not need to create any new documents.

If you do possess any such documents, reports, surveys, analyses, studies, or other overview documents, then provide copies as they are kept in the ordinary course of business, without identifying any student-specific data.

I. CASE INFORMATION

1. Plaintiff: Crestwood School District, Pennsylvania
2. Name of the court in which the complaint was initially filed:
Middle District of Pennsylvania – United States District Court
3. Case number in court in which complaint was originally filed:
3:23-cv-01264-RDM
4. Filing date of the complaint: Jul 30 2023
5. Named defendants in the complaint:
The defendants named in the Master Complaint and Short Form Complaint are: Meta Platforms, Inc.; Instagram, LLC; Facebook Payments, Inc.; Siculus, Inc.; Facebook Operations, LLC; Facebook Holdings, LLC; Meta Payments, Inc.; Bytedance LTD; Bytedance Inc.; TikTok LTD; TikTok LLC; TikTok Inc.; Snap, Inc.; Google, LLC and Youtube, LLC
6. Name, firm, and e-mail address of the principal attorney(s) representing Plaintiff:
Joseph J. Cappelli
Marc J. Bern & Partners, LLP
101 West Elm Street, Suite 520
Conshohocken, PA 19428

II. REPRESENTATIVE CAPACITY

For purposes of Section II (Representative Capacity) "you" refers to the person filling out this form. When you complete the rest of this form "you," "your," "Plaintiff," and "School District" refers to the School District Plaintiff named in this action, including any departments, divisions, agents, and/or employees.

7. Name of individual(s) completing this Fact Sheet:

John G. Dean

8. Role within Plaintiff's organization:

Solicitor for School District

III. SCHOOL DISTRICT DATA

9. Provide the total number of schools in your district at each level from kindergarten through 12th grade from the 2017-2018 school year to present or the year for which data is most currently available:

Year	Level	Number of Schools
2023-2024	Elementary School	2
	Middle School	
	High School	1 (Middle School & High School are combined into one school)
	Other	
2022-2023	Elementary School	2
	Middle School	
	High School	1 (Middle School & High School are combined into one school)
	Other	

Year	Level	Number of Schools
2021-2022	Elementary School	2
	Middle School	
	High School	1 (Middle School & High School are combined into one school)
	Other	
2020-2021	Elementary School	2
	Middle School	
	High School	1 (Middle School & High School are combined into one school)
	Other	
2019-2020	Elementary School	2
	Middle School	
	High School	1 (Middle School & High School are combined into one school)
	Other	
2018-2019	Elementary School	2
	Middle School	
	High School	1 (Middle School & High School are combined into one school)
	Other	

Year	Level	Number of Schools
2017-2018	Elementary School	2
	Middle School	
	High School	1 (Middle School & High School are combined into one school)
	Other	

10. Provide the total number of students enrolled in your district, and the student population at each level from kindergarten through 12th grade from 2017-2018 to present or to the year for which data is most currently available:

Year	Level	Number of Students
2023-2024	District-Wide	2,766
	Elementary School	1,391
	Middle School	428
	High School	947
	Other	
2022-2023	District-Wide	2,816
	Elementary School	1,414
	Middle School	453
	High School	949
	Other	

Year	Level	Number of Students
2021-2022	District-Wide	2,810
	Elementary School	1,376
	Middle School	461
	High School	973
	Other	
2020-2021	District-Wide	2,764
	Elementary School	1,400
	Middle School	443
	High School	921
	Other	
2019-2020	District-Wide	2,843
	Elementary School	1,474
	Middle School	445
	High School	924
	Other	
2018-2019	District-Wide	2,801
	Elementary School	1,465
	Middle School	442
	High School	894
	Other	

Year	Level	Number of Students
2017-2018	District-Wide	2,807
	Elementary School	1,425
	Middle School	499
	High School	883
	Other	

11. Provide the total number of district employees from 2017-2018 to present or to the year for which data is most currently available (specified as Full Time Equivalents ("FTE") if available):

Year	Number of Employees
2023-2024	312
2022-2023	368
2021-2022	381
2020-2021	320
2019-2020	304
2018-2019	351
2017-2018	342

12. Provide the total number of teachers employed by your district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available):

Year	Number of Teachers
2023-2024	154
2022-2023	167
2021-2022	169
2020-2021	164
2019-2020	165
2018-2019	166
2017-2018	164

13. Provide the total number of on-campus health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors, etc.) employed by the district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of On-Campus Health Care Workers	Number of On-Campus Health Care Volunteers
2023-2024	10	
2022-2023	11	
2021-2022	11	
2020-2021	10	
2019-2020	10	
2018-2019	10	
2017-2018	10	

14. Provide the total number of off-campus health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors, etc.) employed by the district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of Off-Campus Health Care Workers	Number of Off-Campus Health Care Volunteers
2023-2024	0	
2022-2023	0	
2021-2022	0	
2020-2021	1	
2019-2020	1	
2018-2019	1	
2017-2018	1	

- Case 4:22-md-03047-YGR Document 743-12 Filed 04/05/24 Page 11 of 41
15. Other than health care workers identified above, does the district have other employees who provide mental health services? **If yes**, provide the total number of such employees from 2017-2018 to present or to the year for which data is most currently available and their positions (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of Employees	Number of Volunteers	Positions
2023-2024	0		0
2022-2023	0		0
2021-2022	0		0
2020-2021	0		0
2019-2020	0		0
2018-2019	0		0
2017-2018	0		0

- Case 4:22-md-03047-YGR Document 743-12 Filed 04/05/24 Page 12 of 41
16. Provide the total number of health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors) employed by the district whose primary responsibilities include addressing student mental health issues from 2017-2018 to present or to the year for which data is most currently available and their positions (specified as FTE if available)), as well as the total number of volunteers in these positions, if any:

Year	Number of Employees	Number of Volunteers	Positions
2023-2024	10		Social worker, nurses, psychologist, counselor
2022-2023	11		Social worker, nurses, psychologist, counselor
2021-2022	11		Social worker, nurses, psychologist, counselor
2020-2021	10		Social worker, nurses, psychologist, counselor
2019-2020	10		Social worker, nurses, psychologist, counselor
2018-2019	10		Social worker, nurses, psychologist, counselor
2017-2018	10		Social worker, nurses, psychologist, counselor

17. Does your district maintain organizational charts depicting the district's general organizational structure?

Choose your answer (Yes/No): Yes

If yes, please provide a copy of the organizational chart(s) for the most recent year it is available.

IV. PEOPLE WITH KNOWLEDGE

18. Identify the superintendent(s), vice/assistant superintendent(s), director of student and family services, director of school health and/or safety, director of technology, and chief financial officer/head of finance, or the individuals in equivalent positions, in your district from 2017-2018 school year to the present:

2017-2018, Superintendent Joseph Gorham

2018-2019, Acting Superintendent Joseph Rasmus

2019-2022, Superintendent Robert Mehalick

2022-2024, Superintendent Natasha Milazzo

2017-2018, Business Manager Melone Company

2018-2022, Business Manager Peter Bard

2022-2023, Business Manager Natasha Milazzo

2023-2024, Business Manager Tom Benz

The School District reserves the right to supplement this response.

19. To the extent not listed above, identify the person(s), including their title/position, at the district level whose primary responsibility was the district's budget, funding, or grant procurement efforts from the 2017-2018 school year to the present:

2017-2018, Business Manager Melone Company

2018-2022, Business Manager Peter Bard

2022-2023, Business Manager Natasha Milazzo

2023-2024, Business Manager Tom Benz

The School District reserves the right to supplement this response.

20. Identify the person(s), including their title/position, in your district most knowledgeable about student use of social media on school property and the impact of such use on your district from the 2017-2018 school year to the present:

2017 – present, Damien Blanchard, Director of Technology
The School district reserves the right to supplement this response.

21. To the extent not listed above, identify the person(s), including their title/position, in your district most knowledgeable about student mental health issues from the 2017-2018 school year to the present:

2017 – 2020, Joe Ramus

2020 – 2022, Bethanne Harris

2022 – 2023, John Gorham

2023 – 2024, Courtenay Degnon

The School District reserves the right to supplement this response.

V. **DAMAGES**

22. State generally in what way or how you claim you have been damaged by each defendant's alleged acts at issue in this lawsuit and approximately when that injury began.

Plaintiff has not yet determined the amount of damages, including costs of abatement, resulting from Defendants' actions and/or omission as alleged in Plaintiff's Master Complaint. These damages are expected to include, but are not limited to, past and future expenses and costs to address and abate the mental health crisis facing its students, which mental health crisis Plaintiff alleges was caused by the Defendants' actions and/or omissions. These costs and expenses are expected to include, but are not limited to, hiring additional staff specifically to address the mental health of students, developing or expanding mental health resources for students, additional mental health training for staff and teachers, increased costs associated with disciplining students for social media based behaviors, repairing and replacing facilities damaged by students acting out as a result of problems caused by Defendants' platforms and conduct and/or updating student handbooks and codes of conduct as related to the use of Defendants' platforms. Plaintiff will supplement this response when Plaintiff determines the amount of any such damages.

23. Are you seeking any monetary damages?

Choose your answer (Yes/No): Yes

If yes, identify each category of damages or monetary relief that you allege.

Plaintiff refers Defendants to Plaintiff's response to No. 22 herein.

24. Are you seeking injunctive relief other than abatement?

Choose your answer (Yes/No): Yes

If yes, provide a general description of the injunctive relief sought.

As stated in Plaintiffs' Master Complaint, Plaintiffs are seeking the Court to enjoin Defendants from engaging in further actions causing and contributing to the public nuisance described in Plaintiffs' Master Complaint.

25. Are you seeking abatement (e.g. forward looking relief to address the problem, including continuation of existing programs, expansion of some or all of those programs, and/or creation of new programs)?

Choose your answer (Yes/No): Yes

If yes, provide a general description of the abatement sought.

Plaintiff refers Defendants to Plaintiff's response to No. 22 herein.

26. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes known expenditures and anticipated future expenditures made by your District, related to youth mental health?

Choose your answer (Yes/No): Yes

If yes, provide a copy and identify the documents(s) responsive to this question.

The School District is attempting to locate documents responsive to this request and will provide any such document to Defendants when located. The School District reserves the right to supplement this response.

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27. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes known costs incurred or damages sought as a result of any harms to your district which you attribute to social media?

Choose your answer (Yes/No): No

If yes, provide a copy and identify document(s) responsive to this question.

The School District refers Defendant to Exhibit 2 – “Mental Health Costs”. The School District reserves the right to supplement this response.

VI. INTERACTIONS WITH DEFENDANTS

28. Have you, any schools in your district, or any affiliated organization (i.e., a parent-teacher association) communicated with any of the Defendants regarding students' use of social media? Note: This question is limited to individuals authorized to speak on behalf of the district or school and is not meant to include marketing or routine customer service correspondence, e.g., account registration, password resets, help desk questions, or the district's use of Defendants' platforms for communicating with third parties.

Choose your answer (Yes/No): No

If yes, please describe the timeframe and general nature of the communications.

29. Have you been involved in any other litigation against any social media company? For purposes of this question, "social media company" refers to any Defendant in this litigation and/or any other social media company not named in the Complaint.

Choose your answer (Yes/No): No

If yes, for each lawsuit, state (1) the court in which the lawsuit was filed; (2) the case name; (3) the civil action or docket number assigned to the lawsuit; and (4) your involvement or claims in the lawsuit.

30. Has your district incorporated the use of any of Defendants' platforms in its curriculum since the 2017-2018 school year?

Choose your answer (Yes/No): No

If yes, please generally describe and identify which platform(s).

31. Have you received any grant, donation, or other funding from any of the Defendants?

Choose your answer (Yes/No): No

If yes, describe generally the grant/donation/funding, state the approximate date of receipt, and identify which Defendant it came from.

VII. SCHOOL POLICIES FOR ELECTRONIC DEVICES, INTERNET, AND SOCIAL MEDIA USE

32. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of the internet or social media on school property from the 2017-2018 school year to present?

Choose your answer (Yes/No): Yes

If yes, attach copies of the relevant codes or policies.

33. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of the internet or social media off school property from the 2017-2018 school year to present?

Choose your answer (Yes/No):

If yes, attach copies of the relevant codes or policies.

34. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address teachers' use of the internet or social media on school property from the 2017-2018 school year to present?

Choose your answer (Yes/No):

If yes, attach copies of the relevant codes or policies.

35. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address teachers' use of the internet or social media off school property from the 2017-2018 school year to present?

Choose your answer (Yes/No):

If yes, attach copies of the relevant codes or policies.

36. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of electronic devices, e.g., cell phones, on school property from the 2017-2018 school year to present?

Choose your answer (Yes/No):

If yes, attach copies of the relevant codes or policies.

37. Has your district ever had a policy and/or program whereby students are issued tablets, laptops, or similar devices for students' use in the course of the school year for educational purposes?

Choose your answer (Yes/No): _____

If yes, please provide the policy since the 2017-2018 school year or generally describe the policy and/or program, including material changes since the 2017-2018 school year.

The School District refers Defendants to the documents from the School District's Policy Manual and to PSBA Administrative Regulation 830.1-AR-0 Data Storage and Security which are in Exhibit 3. The School District Reserves the right to supplement this response.

VIII. SOCIAL-MEDIA AND MENTAL HEALTH SERVICES AND PROGRAMS

38. Describe the portion of your student body receiving mental health services in your district and how it has changed over time since the 2017-2018 school year, including approximate numbers and percentages if available in any existing report, survey, analysis, study or other document that provides an overview of or describes student mental health services. Note: This question is not designed to require review of underlying individual student records.

The School District is attempting to determine this information and if any such information can be determined will provide it to Defendant. The School District reserves the right to supplement this response.

39. Have you formally proposed, formed, or participated in any district-wide task force, other program, or group to address issues related to social media use or youth mental health among students?

Choose your answer (Yes/No): _____

If yes, identify the name of any such program(s), what aspects of student social media use and/or mental health were addressed, and the approximate dates of the district's participation in the task force, group, or program.

The School District is attempting to determine this information and if any such information can be determined will provide it to Defendant. The School District reserves the right to supplement this response.

40. Have you formally proposed, formed, or participated in any district-wide task force, other program, or group to address behavioral issues, bullying, absences, substance abuse, mobile device use, addiction, and/or vaping?

Choose your answer (Yes/No): Yes

If yes, identify the name of any such program(s), what student issues were addressed, and the approximate dates of the district's participation in the task force, group, or program.

The School District is attempting to identify this information and when this information is identified will provide it to Defendants. The School District reserves the right to supplement this response.

41. Has your district provided trainings for employees on how to address student mental health issues relating to social media?

Choose your answer (Yes/No): Yes

If yes, please generally describe what types of trainings were offered by your district, when they were offered, whether attendance at the trainings was mandatory or optional, and the categories of employees at the district that were required to attend.

The School District is attempting to identify this information and when this information is identified will provide it to Defendants. The School District reserves the right to supplement this response.

42. Does your district use or provide any materials to students, parents, teachers, or staff regarding the potential risks or adverse effects of using electronic devices, the internet and/or social media?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

IX. INCIDENCE OF OTHER TRAUMATIC EVENTS

43. Was your district ever closed to in-person learning during the COVID-19 pandemic?

Choose your answer (Yes/No): Yes

If yes, please generally describe when schools were closed, when remote learning was offered, and when students came back to in-person learning.

Please also provide any written district-wide policies implementing remote learning.

The School District is attempting to identify this information and when this information is identified will provide it to Defendants. The School District reserves the right to supplement this response.

X. FINANCIAL INFORMATION

44. Provide the district's overall budget for each year from the 2017-2018 school year to the present.

Year	Overall Budget
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

45. What is the approximate annual amount budgeted for health services in the district, if separately budgeted/itemized? Has that amount increased or decreased by more than 20% since the 2017-2018 school year?

Choose your answer (Yes/No): Yes

If yes, please describe.

The School District refers Defendants to Exhibit 4 – “Mental Health Costs”. The School District reserves the right to supplement this response.

46. What is the approximate annual amount budgeted for mental health services in the district, if separately budgeted/itemized? Has that amount increased or decreased by more than 20% since the 2017-2018 school year?

Choose your answer (Yes/No): Yes

If yes, please describe.

The School District refers Defendants to Exhibit 4 – “Mental Health Costs”. The School District reserves the right to supplement this response.

XI. DOCUMENTS RELATING TO MENTAL HEALTH, SOCIAL MEDIA USE, OTHER EVENTS, AND EXPENDITURES

A. Prevalence

47. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of or number of students with reported mental health issues in your district and the possible causes of those issue?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

The School District is in the process of determining if any documents are/may be responsive to this request and if any such documents are identified, will provide any such documents to Defendants. The School District reserves the right to supplement this response.

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48. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of the harms associated with student social media use in your district, including associated mental health issues and classroom disruption?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

The School District is in the process of determining if any documents are/may be responsive to this request and if any such documents are identified, will provide any such documents to Defendants. The School District reserves the right to supplement this response.

49. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of students in the district receiving mental health services through the district?

Choose your answer (Yes/No): _____

If yes, provide a copy (should include students at each level if part of the document(s)) and identify the document(s) responsive to this question.

The School District is in the process of determining if any documents are/may be responsive to this request and if any such documents are identified, will provide any such documents to Defendants. The School District reserves the right to supplement this response.

50. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of social media use in your district and/or the impact of social media use in your district?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

The School District is in the process of determining if any documents are/may be responsive to this request and if any such documents are identified, will provide any such documents to Defendants. The School District reserves the right to supplement this response.

51. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes traumatic events, i.e. school shooting, violence at school by a non-student or non-staff members, or threats of violence?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

The School District is in the process of determining if any documents are/may be responsive to this request and if any such documents are identified, will provide any such documents to Defendants. The School District reserves the right to supplement this response.

52. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes attempted or completed suicides among staff or students?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question

The School District is in the process of determining if any documents are/may be responsive to this request and if any such documents are identified, will provide any such documents to Defendants. The School District reserves the right to supplement this response.

B. Discipline measures

53. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes interventions, discipline, or other consequences imposed on students for using social media on school premises?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

The School District is in the process of determining if any documents are/may be responsive to this request and if any such documents are identified, will provide any such documents to Defendants. The School District reserves the right to supplement this response.

54. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes disciplinary issues among students in your district, possible causes of those issues, and any interventions and/or consequences imposed?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

The School District is in the process of determining if any documents are/may be responsive to this request and if any such documents are identified, will provide any such documents to Defendants. The School District reserves the right to supplement this response.

CERTIFICATION

I have made reasonable inquiries to answer the foregoing questions. Based on my personal knowledge and the information provided by other district employees, I declare under penalty of perjury that the information provided in this Plaintiff Fact Sheet is complete, true, and correct to the best of my knowledge and information, and that I have provided all of the requested documents that are reasonably accessible to me and/or my attorneys, to the best of my knowledge.

John G. Dean

Apr 1 2024

Signature

Date

John G. Dean

Solicitor for School District

Name (Printed)

Title